



300 S. WACKER DRIVE, SUITE 2050
CHICAGO, IL 60606
(P) 312.465.1740
(F) 262.523.9001

Mr. Ross del Rosario
USEPA Region 5 – SR6J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

October 11, 2012
2037

RE: September 2012 Monthly Progress Report
Former Crawford Station MGP Site
Chicago, Illinois
Peoples Gas Light and Coke Company

CERCLA Docket No. V-W-08-C-917 and V-W-11-C-981
CERCLIS ID – ILN0000510192

Dear Mr. del Rosario:

On behalf of Integrys Business Support, LLC (IBS), Natural Resource Technology, Inc. (NRT) is providing this Monthly Progress Report for the Former Crawford Station Manufactured Gas Plant (MGP) Site. This report encompasses the Removal Action work and the Remedial Investigation/Feasibility Study (RI/FS) activities that are being performed concurrently.

I. Time Critical Removal Action (AOC V-W-11-C-981)

1) Progress Made During the Past Month

Removal Action Area – Parcels A, B, & O

- The Removal Action on Parcels A, B, & O is on-going in accordance with the USEPA-approved Removal Action Work Plan, Rev. 1 (RAWP).
- Wastewater generated during the Removal Action is being treated on-site and discharged into the City of Chicago sewer system and then conveyed to the Metropolitan Water Reclamation District of Greater Chicago's (MWRD's) interceptor system for treatment. For the month of July, a total of 347,627 gallons was discharged. For the project, a total of 3,129,498 gallons have been discharged through September 30, 2012.
- Soil excavation and removal is continuing. For the month of August, a total of 20,058 tons of soil has been transported off-site for disposal. For the project, a total of 295,881 tons of soil have been excavated and transported to Waste Management's Laraway Road RDF for disposal.
- The August monthly progress report was prepared and submitted to USEPA on September 11, 2012.
- Full Scale Air Monitoring was conducted consisting of continuous daily monitoring of PM₁₀ and one 12-hour SUMMA sampling event per week at one upwind and two downwind locations.
- Soil samples were collected from the walls and base of the excavations at the frequency outlined in the RAWP.
- Excavated soils from adjacent Peoples Gas integrity digs (i.e., excavations along the alignment of the high pressure gas lines) are being handled along with soils from the Removal Action excavation.

Groundwater accumulating in the excavation is being pumped to the water treatment system for eventual discharge into the MWRD system.

- The 24-inch gas line is scheduled to be replaced. Source material was observed in the western portion of the 24-inch gas line integrity excavation area. NRT conducted additional soil borings along the length of the 24-inch gas line to investigate the extent of the source material in the vicinity of the high pressure gas lines. The USEPA was notified of the source material in letter dated August 29, 2012. USEPA approved the additional removal work via email. Work is scheduled to begin in early October.
- An odor mitigation system in use along the western property boundary.
- USEPA conducted various site visits during September. A brief description of the visits is given below.
 - Mr. Brad Bradley, the USEPA was on site on September 11 and 18, for a tour of the site. Mr. Bradley was given a site tour and reviewed the current and projected construction activities to date.

Parcel L

Removal Action Work Plan Addendum for Parcel L was submitted to the USEPA on August 15, 2012. The USEPA reviewed the Addendum and provided IBS and NRT with questions and comments on September 19, 2012. IBS and NRT are currently preparing a response to these comments and questions.

2) Analytical and Other Testing Results Received

- Full Scale Air Monitoring Events sampling data is provided in tabular form as Attachment No. 1.
- Post-Excavation soil sample data that was received in September is provided in tabular form as Attachment No. 2. Please note that three soil samples collected from Area W (EW-48, EW-49, and EW-50) failed to meet the post-excavation sampling criteria for determining non-source material. These samples were in an area of the site adjacent to two 42-inch high-pressure gas pipelines and are unable to be excavated in a safe manner at this time.

3) Project Work Next Month

IBS Actions

- Continue soil excavation activities and hauling to Waste Management's Laraway Road RDF.
- Continue Full Scale Perimeter Air Monitoring consisting one 12-hour SUMMA sampling event per week and daily PM₁₀ monitoring.
- Conduct Periodic Real-Time Air Monitoring with portable and hand-held equipment during construction activities.
- Conduct Post-Excavation Soil sampling for every 50 feet of wall and 2,500 square feet of floor.
- Conduct excavation in area of 24-inch gas line.

USEPA Actions

- Review RAWP Addendum for Parcel and respond with comments or approval.

4) Anticipated Schedule

Deliverable or Milestone	Target Date	Actual Date
Settlement Agreement Signed	--	October 12, 2011
Project Start Date		October 12, 2011
Monthly Progress Reports	Due the 11 th of Each Month	
Removal Action Work Plan, Rev 0 ¹		August 1, 2011
Removal Action Work Plan, Rev. 1 ¹		September 6, 2011
USEPA Approval of RAWP ¹		September 8, 2011
Removal Action (AB&O) – Start Date	November 2011	January 31, 2012
Removal Action (AB&O) – Completion Date	Late 2012	

¹ Removal Action Work Plan documents were prepared pursuant to AOC V-W-08-C-917

5) Problems or Potential Problems Encountered

- None

6) Actual or Planned Resolution of Problems or Potential Problems

- None

II. RI/FS Activities (AOC V-W-08-C-917)

1) Progress Made During the Past Month

- The SSWP, Rev. 1 to address USEPA's comments was submitted in conjunction with a response to comments letter on August 6, 2012.

2) Analytical and Other Testing Results Received

- None.

3) Project Work Next Month

IBS Actions

- A response to comments letter clarifying the items noted in USEPA's comments on the SSWP Rev. 1 is in preparation and will be submitted by October 19, 2012.

USEPA Actions

- USEPA's comments were issued on September 4, 2012 and are currently under evaluation by IBS.

Mr. Ross del Rosario
October 11, 2012
Page 4



4) Anticipated Schedule

Deliverable or Milestone	Target Date	Actual Date
Settlement Agreement Signed	--	October 31, 2008
Project Start Date		December 15, 2011
Monthly Progress Reports	Due the 14 th of Each Month	
Completion Report , Rev. 0	December 15, 2011	December 23, 2012
Pre-Site Specific Scoping Meeting	January 24, 2012	January 24, 2012
Site Specific Work Plan, Rev. 0	March 14, 2012	March 14, 2012
Receive USEPA Comments on SSWP, Rev. 0	May 14, 2012	May 22, 2012
Site Specific Work Plan, Rev. 1	August 5, 2012	August 6, 2012
USEPA Approves SSWP, Rev. 1	September 5, 2012	
RI/FS (Parcel Group 1)	October, 2012 to Sept. 2014	

5) Problems or Potential Problems Encountered

- None.

6) Actual or Planned Resolution of Problems or Potential Problems

- None.

Please contact Mr. Naren Prasad of IBS at 312.240.4569 if you should have any questions regarding the content of this progress report.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

A handwritten signature in black ink, appearing to read "John M. Nardozzi".

John M. Nardozzi, P.E.
Principal Engineer

A handwritten signature in black ink, appearing to read "Timothy B. Norris".

Timothy B. Norris, PG
Geologist

Attachments:

Attachment No. 1 – Full Scale Air Monitoring Data
Attachment No. 2 – Post Excavation Soil Sample Data

cc: D. Wilson, IEPA (via US Mail and email)
Mr. Naren Prasad, Integrys (via email)
Mr. David Klatt, CH2M Hill (via email)
Ms. Jennifer Kahler, NRT

Attachment No. 1
Full Scale Air Monitoring
Former Crawford Station MGP Site, Chicago, Illinois
Peoples Gas Light and Coke Company

ILN0000510192

Air Station	Client ID	Date Collected	Constituent/Result [micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)]				
			Benzene	Ethylbenzene	Toluene	Xylenes, Total	Naphthalene
South	120829001	8/29/2012	0.64 U	0.87 U	3.3	2.1	2.6 U
West	120829002	8/29/2012	0.64 U	0.87 U	1.2	1.2	3.2
North	120829003	8/29/2012	0.65 U	0.87 U	1.2	1.1	2.6 U
South	120906001	9/6/2012	0.69	0.87 U	2.1	1.6	2.6 U
West	120906002	9/6/2012	0.64 U	0.87 U	1.8	1.2	2.6 U
North	120906003	9/6/2012	0.64 U	0.87 U	2.0	1.3	2.6 U
South	120912001	9/12/2012	0.64 U	0.87 U	31	1.6	2.6 U
West	120912002	9/12/2012	0.64 U	0.87 U	48	1.8	2.6 U
North	120912003	9/12/2012	0.64 U	0.87 U	44	1.8	2.6 U
South	120919001	9/19/2012	1.3	0.86	7	3.3	2.6 U
South (dup)	120919002	9/19/2012	1	0.95	11	3.7	2.6 U
West	120919003	9/19/2012	0.87	0.87 U	2.5	1.7	2.6 U
North	120919004	9/19/2012	2.1	1.3	11	4.6	4.6
South	120926001	9/26/2012	0.64	0.87 U	2.0	2.4	3.1
West	120926002	9/26/2012	0.64 U	0.87 U	1.6	2.1	2.6 U
North	120926003	9/26/2012	0.64 U	0.87 U	1.6	1.6	2.6 U

Note:

1) U - Analyte was not detected. The associated number is the detection limit.

